



KWOM Internet Services
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September 16, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: TV White Spaces
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:

KWOM provides fixed wireless broadband service in rural DeKalb and LaSalle counties in northern Illinois. We specifically serve customers in areas where DSL and cable are not available. Population density is low, and we need to reach customers 5 to 10 miles from a base station, while using primarily license exempt spectrum. It is a challenge to achieve 100% availability in these areas, due to hills and trees. The traditional solution has been 900 MHz, but that band is no longer viable because of the limited throughput and interference from FHSS smartgrid equipment. So we are very interested in the FCC's initiative on TV white space.

We are a member of WISPA and support the comments filed by WISPA. I would like to specifically comment on a few items from the perspective of a WISP serving rural areas.

1) The 10 meter restriction on CPE antenna height is not realistic in our area. A ranch house may only be 5 meters high, so we are talking about putting an antenna on a tripod and mast 5 meters above the roof. Clearly this poses aesthetic issues for the homeowner.

But even 2 story houses in rural areas rarely have antennas on the roof, due to wind and lightning risks. A farm house standing out in the open is exposed to 70+ mph winds, and lightning that wants to hit the highest point. For this reason, satellite dishes are typically mounted on 2 meter poles in the yard. It would be very unwise to mount CPE antennas 10 meters above ground level in rural areas if the customer does not have a legacy antenna tower next to the house. We also see little benefit to primary and secondary users of the band, by requiring CPE antennas to be mounted this high in a rural area.

2) We support WISPA's request to allow more than 4 watts EIRP in rural areas. We need the additional range, in areas of sparse population and few towers to transmit from. Perhaps rules could be formulated to allow higher power in remote areas, while still protecting primary and secondary users.

3) We request the FCC to reject FiberTower's proposal to license point-to-point links in this band, which does not seem particularly well suited to this use except for the availability of inexpensive antennas. We find their justification unpersuasive, and approval of their proposal will be a significant disincentive to WISPs that would otherwise consider deploying TV white space equipment to serve remote areas.

Regards,

Ken Hohhof
President